

# **EXHIBIT 2**

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

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TENNESSEE CONFERENCE of the NATIONAL  
ASSOCIATION for the ADVANCEMENT of  
COLORED PEOPLE, on behalf of itself  
and its members, et al.,

Plaintiffs,

vs.

Case No. 3:20-CV-01039

WILLIAM LEE, in his official capacity  
as Governor of the State of Tennessee,  
et al.,

Defendants.

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30(b)(6) Deposition of:

ELIZABETH HENRY-ROBERTSON

Taken on behalf of the Plaintiffs  
December 5, 2023  
Commencing at 9:28 a.m.

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Reported by: Georgette K. Arena, RPR, LCR  
BERES & ASSOCIATES  
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1 been restored?

2 A. That's what's still being determined.

3 Q. But there's no current position?

4 A. It's being discussed, looking at the legal  
5 aspects of that.

6 Q. Okay. But you're saying that as of right  
7 now, there is no determinative position that the  
8 elections division holds on that question?

9 A. If gun rights have been excluded or another  
10 right has been excluded, no, not as of yet.

11 Q. Have you had to review any court orders that  
12 say that and determine whether or not a person has  
13 had their citizenship rights restored under Section  
14 2-19-143?

15 A. If the court order -- we have had a court  
16 order that restores citizenship rights. It did not  
17 have any exclusion.

18 Q. Did not have any exclusions, okay.

19 A. It did not use the word "full," but it did  
20 not excluded anything, any rights.

21 Q. Okay. Where was that order from?

22 A. It's a Tennessee -- I think it's Sumner  
23 County.

24 Q. Okay. Okay. We can talk more about all that  
25 later.

## REPORTER'S CERTIFICATE

STATE OF TENNESSEE

COUNTY OF WILLIAMSON

I, Georgette K. Arena, RPR, Licensed  
Court Reporter, with offices in Franklin,  
Tennessee, hereby certify that I reported the  
foregoing deposition of ELIZABETH HENRY-ROBERTSON  
by machine shorthand to the best of my skills and  
abilities, and thereafter the same was reduced to  
typewritten form by me. I am not related to any of  
the parties named herein, nor their counsel, and  
have no interest, financial or otherwise, in the  
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My Notary Public Commission Expires: 2/22/26  
LCR # 091 - Expires: 6/30/24

